

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SHAWN CAREY, MSS CAPITAL, LLC,
HUNTS ROAD, LLC, ION1 LLC,
BRICKELL CAPITAL SOLO 401K TRUST,
KAILEY LEWIS, EDWARD REINLE,
EMANUEL VALADAKIS and ZITAH
MCMILLAN-WARD, individually and on
behalf of all others similarly situated,

Case No. 1:24-cv-07551

Plaintiffs,

v.

MICHAEL MOE, PETER B. RITZ, LZG
INTERNATIONAL, INC., ROGER
HAMILTON, and GENIUS GROUP
LIMITED,

Defendants.

**PLAINTIFFS' MOTION TO DESIGNATE LEAD PLAINTIFF
AND APPROVE AXS LAW, PLLC AS LEAD COUNSEL**

Plaintiffs, Shawn Carey, Hunts Road, LLC, Ion1 LLC, Brickell Capital Solo 401k Trust, Kailey Lewis, Edward Reinle, Emanuel Valadakis, and Zitah Mcmillan-Ward (the “Group”), move this Court for an order: (1) appointing the Group as Lead Plaintiff; (2) approving the Group’s selection of AXS Law Group, PLLC to serve as Lead Counsel; and (3) granting other and further relief as the Court may deem just and proper. In support of this Motion, Plaintiffs submit a Memorandum of Law and the Declaration of Bernardo N. M. Franco, dated December 26, 2024.

Dated: December 26, 2024.

Respectfully submitted,

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By: /s/ Jeffrey W. Gutchess
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*Counsel for Proposed Lead Plaintiff
and Proposed Lead Counsel for the Class*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on December 26, 2024, a true and correct copy of the foregoing was served on all counsel of record via CM/ECF.

By: /s/ Jeffrey W. Gutchess
Jeffrey W. Gutchess